

DEPARTMENT OF BENEFIT PAYMENTS

744 P Street, Sacramento, CA 95814
(916) 322-5330



April 5, 1976

ALL-COUNTY LETTER NO. 76-57

TO: ALL COUNTY WELFARE DIRECTORS

SUBJECT: VERIFICATION OF SOCIAL SECURITY BENEFITS

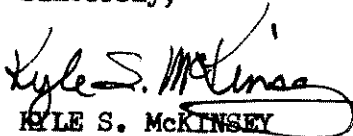
REFERENCE:

Attached is the report of a study conducted to identify problems in verifying social security benefits in the AFDC eligibility and grant determination process.

As follow up to the study, the appropriate Eligibility and Assistance Standards (EAS) Manual section is being revised and a training module is being developed. In addition, the Department of Benefit Payments is following up with the Social Security Administration on improvements at the federal level.

If you have any questions, please contact your county's AFDC Management Consultant at (916) 445-4458.

Sincerely,


KYLE S. MCKINSEY
Deputy Director

Attachment

cc: CWDA

1610 VERIFICATION SYSTEM STUDY

Department of Benefit Payments
AFDC Program Management Branch

March, 1976

I. Introduction

A. Background

Eligibility and grant determination errors associated with receipt of Social Security benefits result in an estimated annual cost of \$3.1 million. The method available to counties and to state Quality Control staff for documenting Social Security benefit awards allotted to AFDC recipients is the SSA 1610 form and verification system. The SSA 1610 is a two-way form initiated at the state or county level and sent to a local Social Security Administration (SSA) office for completion. The requested information is then returned by SSA.

County welfare departments and state Quality Control staff have complained that the 1610 system does not work effectively. It has been alleged that the SSA 1610s are not always returned by SSA. Those that are returned are often not timely and/or accurate. Consequently, a detailed study of the 1610 verification system was undertaken by the Department of Benefit Payments as an AFDC corrective action project.

B. Objectives

The objectives of this study were to identify and document specific problem areas and develop corrective action recommendations that could be implemented to improve the statewide 1610 system at the county and SSA levels.

C. Summary of Findings and Recommendations

The five-county study indicated problem areas in the internal operations of both the county welfare departments (CWD) and the local Social Security Administration (SSA) offices.

CWD Summary

1. Major Findings

- a. Lack of guidelines for initiation of the 1610.
- b. Improper completion of the 1610.
- c. Failure to provide SSA with CWD return address.
- d. Confusion regarding the appropriate SSA office to send the 1610.
- e. Ineffective 1610 log controls.

2. Recommendations

- a. Standardized guidelines for initiating a 1610 should be adopted in each CWD.

- b. Written procedures should be established in each county for proper completion of the 1610.
- c. Preprint CWD return address on 1610s.
- d. The address of the appropriate SSA office should be included in written procedures for completion of the 1610.
- e. Set up control system for logging in returned 1610 and an automatic follow-up if a timely response is not received.

SSA Summary

1. Major Findings

- a. Low priority is given to processing 1610 requests.
- b. The primary source of information is not usually the most current.
- c. Sources of information are not always exhausted.
- d. Communication breakdown exists as a result of SSA failure to provide the CWD an interim response and/or notice of referral of a recipient to a claims unit.

2. Recommendations

- a. Processing the 1610 should be given a higher priority and assigned to one unit or clerk, where possible.
- b. Master Beneficiary Records (MBRs) should be used as the primary source of information.
- c. All sources of information should be queried if necessary to verify benefits.
- d. An interim response should be sent to the CWD giving the status of the request when additional time is required to process the 1610.
- e. SSA should notify the CWD when referring a recipient to their claims unit for possible benefits.

D. Methodology

1. Initial Survey

Initially, a telephone survey of several counties was performed to record actual experiences with the 1610 process. In addition, the 1610 system was discussed with state QC staff and the SSA Sacramento District Office was contacted for information regarding SSA's internal procedures.

2. County and Case Selection

Based on the information gained in the telephone survey, five counties were selected for a more extensive review. The five counties were Los Angeles, San Francisco, Alameda, Kern, and Mendocino.

In each county, 20 AFDC cases with reported Social Security benefits were chosen for review (21 AFDC cases in Kern County) making a total of 101 cases selected. In addition, at least one local SSA office was visited in each county.

3. Case Review

For each of the 101 cases selected, the determination of eligibility and the amount of the grant was reviewed. Also reviewed was the county's documentation of Social Security benefits. Pertinent information was recorded from case records to be compared with information returned from SSA. No contact was made with recipients.

4. Evaluation of the 1610 Verification System

In each of the five county welfare departments, staff were interviewed and procedural material reviewed to document the processing of 1610 requests. In addition, local SSA office staff in each of the five counties were interviewed and their internal procedures for processing 1610 requests were documented. For each case reviewed, a 1610 was completed and sent to the local SSA office for verification of benefit status. This procedure was followed in order to document turnaround time and accuracy of the system. A log was kept to record each response from SSA. When a completed 1610 was returned, the data contained on the 1610 was compared to what had been obtained from the case record to determine accuracy. A summary of turnaround times and discrepancies found during the review are included in Appendices A and B, respectively.

II. Findings and Recommendations Regarding County Procedures

The five county study of the 1610 process brought to light several problem areas in the internal county welfare department operations. These problems in turn affect the accuracy and turnaround time of the verification process for counties as well as state Quality Control.

A. County Procedure Findings

While each county's procedures vary somewhat, the study indicated similar problems were being experienced by counties in the following general areas:

- When to Initiate the 1610

Guidelines were not clearly established in most counties regarding the initiation of the 1610. One county used it

routinely as a method of verifying Social Security benefits; another only when other sources of information were unavailable. A backlog tends to build up when the 1610 is used routinely for verification, further increasing the turnaround time.

- Completion of the SSA 1610

Only one of the counties studied has written procedures for completing the 1610. Improper completion of the 1610 often results in inaccurate or incomplete information, along with an increase in turnaround time. Particular difficulty arises when the claimants name differs from the wage earners and this is not clarified. Additional problems are encountered in instances where the county needs a definite breakdown of benefits but the necessary information is not included on the 1610. Several SSA offices reported receiving the form without the name and address of the requesting agency. This may account, in part, for the complaints that SSA does not respond to the 1610.

- Where to Send the 1610

Some confusion seemed to exist among county welfare department staff regarding which SSA office to send the 1610. This appears to be particularly a problem in the larger counties (Alameda, San Francisco, Los Angeles) with multiple SSA offices. Several CWD staff thought the 1610s should be sent to Baltimore for processing.

- Log Controls on 1610 Returns

Since two of the counties studied (Mendocino and Kern) send few 1610s to the SSA and have established a good working relationship with them, the turnaround time is relatively short and it is easy to keep track of the responses. However, the three largest counties (Los Angeles, San Francisco and Alameda) appear to have significant problems keeping track of 1610 responses. When more than one person is involved, such as an EW and a unit clerk, communication breakdowns occur. Follow-up requests may be initiated in spite of the EW already receiving the completed 1610 from SSA.

B. Recommendations - CWD

1. A standard policy should be adopted in each CWD regarding initiation of the 1610. The types of cases most likely to require social security benefits verification should be identified and, where possible, this verification should be obtained from the recipient. A 1610 should be sent only when other verification is not available and not simply as a matter of routine.

2. Written procedures for completing the 1610 should be established in each county. All pertinent information must be included on the form before SSA is able to process it and respond. The procedures should include a step-by-step guide to fill out each item on the form; how and when to request a specific breakdown of benefits and other types of information which may facilitate the 1610 process.
3. Preprint the return address on the 1610 before distributing for use by EWs.
4. Instructions for completing the 1610 should include the mailing address of the local SSA office(s) that will process the form. 1610s should not be sent to Baltimore.
5. In counties with control problems, 1610 control systems should be reviewed for improvement in procedures and communication. Among areas for review are the use of log controls, forwarding of returned 1610s to the requesting EW, and follow-up requests to SSA when timely responses are not received.

III. SSA Procedures

The study of the internal operations of the SSA offices indicated several causal factors affecting turnaround time, accuracy of information and communication between CWD and SSA offices.

- Low Priority

Local SSA offices in the three largest counties (Los Angeles, Alameda, San Francisco) concede the 1610s receive low priority. The function of processing the 1610s may rest solely with the local district office service representative or it may initially be handled by one or more clerks. Some offices limit processing of the 1610s to designated times of the month; other local SSA offices process the form when a specific number of them has accumulated. Of the 1610s sent as part of this study, only 39 percent were returned within four weeks from the SSA offices. At the close of the study (more than two months after the 1610s were initiated) 23 of the 1610s had not been returned and four were returned with an interim response only.

- Sources of Information

Complaints of inaccurate information on the returned 1610s were verified by the study. Seventy-four completed 1610s were returned by SSA before the close of the study. Twenty (27 percent) of these contained discrepancies ranging from differences in benefit amounts to inaccurate responses stating there were no benefits being received.

Several sources of information are commonly used by SSA to process the 1610. The primary source used by all but one of the SSA offices

studied is the microfiche file, which lists all those receiving social security benefits. Since the information is generally conceded to be six to nine months old and does not reflect recent increases and/or changes of status, its value is limited. SSA offices in Mendocino County will not use the microfiche file at all because of its outdated information.

The most accurate source commonly used for verification of benefits appears to be the Master Beneficiary Record (MBR). This is an up-to-date record of all those who have been receiving benefits for two or more months. Mendocino County SSA office uses the MBR as the primary source of information. Since it generally takes five to ten days to receive information from the MBR, most of the SSA offices prefer to use the microfiche as the primary source of information even though the MBR contains more accurate and current information. Seldom is the MBR used by Los Angeles County even as a secondary information source. The 250 file is the local paper file used to trace recent (less than two months) applications for benefits. However, the 250 file is limited since it contains only applications received in that particular SSA office. If benefits were applied for in another district office, no record of benefits would be available except through one of the seven payment centers. A Form 2339 may be sent if the 1610 indicates benefits are being received and no record can be found by the local SSA office. This form is used by SSA offices to request information directly from one of the seven regional payment centers. Since a 2339 request takes three weeks to a month before a response is received, this method is seldom used. Usually by the time a response would be received from the payment center, the claimant's status would appear on the MBR.

SSA Data Access and Retrieval System is another source of information used by some SSA offices. Its use is very limited since it records only SSI beneficiaries.

- Communication Breakdown

While not necessarily a major concern, breakdown of communications impedes the process of the 1610 verification system. It was generally agreed by the CWD offices that SSA could reduce one area of concern by providing an interim response on a timely basis. In order to accurately complete the 1610, a SSA local office may request an MBR or other needed information which will further increase the turnaround time without notifying the originating CWD. As a result, the CWD may issue a follow-up request to the SSA, a time-consuming and unproductive action.

Another area of communication which needs improvement is the referral. An SSA local office may use the 1610 as a referral document to their claims unit when there is an indication benefits may be available,

but there is no record of a claim. The 1610 may be returned to the CWD marked "no record of benefits" without notifying the county that SSA will contact the recipient directly to advise of possible benefits. This may result in a duplication of efforts or the CWD being unaware of possible benefits applied for after the 1610 has been returned to them.

D. Recommendations - SSA

1. SSA should assign a higher priority to the processing of 1610 requests. One unit or service representative should be assigned the responsibility of completely processing 1610 requests. If this is not administratively feasible, one clerk should be given the sole responsibility for the initial processing phase.
2. MBRs should be used routinely as the primary source of information to provide an accurate and complete response on the 1610.
3. All sources of information should be queried before responding "no record of benefits" on the returned form.
4. If a 1610 must be forwarded to another district office or if additional information is needed further delaying completion of the 1610, the SSA office should send an "interim" response to the CWD noting the action taken and current status of the request.
5. If SSA plans to follow up on the 1610 as a lead for application, the 1610 should be returned to the county welfare department stating that no record has been found thus far and that SSA plans to contact the recipient directly to solicit an application.

Appendix A
1610 Verification System Study
Summary of Turnaround

	Los Angeles		San Francisco		Alameda		Kern		Mendocino	
	No.	%	No.	%	No.	%	No.	%	No.	%
4 Weeks or Less	3	15%	7	35%	0	-	15	71.4%	14	50%
4-6 Weeks	11	55%	2	10%	10	50%	1	4.8%	1	5%
More Than 6 Weeks	4	20%	2	10%	0	-	0	-	4	20%
Interim Response Only	2	10%	1	5%	0	-	1	4.8%	0	-
No Response	0	-	8	40%	10	50%	4	19.0%	1	5%
Totals	20	100%	20	100%	20	100%	21*	100%	20	100%

*In Kern County, 21 Requests for Information were sent.

Appendix B
1610 Verification System Study
Summary of Discrepancies
Among Returned 1610's

	Number of 1610's Mailed	1610's Returned*		Discrepancies	
		No.	%	No.	%
Los Angeles	20	18	90%	3	16.7%
San Francisco	20	11	55%	5	45.5%
Alameda	20	10	50%	4	40.0%
Kern	21	16	76%	5	31.3%
Mendocino	20	19	95%	3	15.8%
Totals	101	74		20	

*Does not include interim responses